

Exhibit 6

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850



MEDICARE PARTS C & D OVERSIGHT AND ENFORCEMENT GROUP

WORK PLAN REQUEST

May 17, 2013

VIA EMAIL (jeff.kang@walgreens.com)
Jeffrey Kang, M.D., M.P.H.
Interim Chief Executive Officer
Smart Insurance Company
30775 Bainbridge Road, Suite 210
Solon, OH 44139

Contract Number: S0064

Dear Dr. Kang:

The Centers for Medicare & Medicaid Services (CMS) is issuing a request for a work plan to Smart Insurance Company (Smart) due to significant program non-compliance for which Smart was placed under marketing and enrollment sanctions on April 23, 2013.

This work plan request is based on the same violations of Part D requirements stated in the Notice of Immediate Imposition of Intermediate Sanctions, (Suspension of Enrollment and Marketing), for Prescription Drug Plan Contract S0064 issued to Smart on April 23, 2013.

Work Plan Request

Pursuant to 42 C.F.R. § 423.509(c)(i), Smart must develop and implement a plan to correct its program deficiencies (work plan). CMS will determine whether Smart successfully implemented its work plan by monitoring Smart's performance throughout the duration of the intermediate sanctions.

During a meeting between Smart executives and CMS Leadership on May 6, 2013, Smart agreed to implement a work plan that includes the actions listed below. Smart also agreed that it may be necessary to expand the scope of its work plan if it determines additional actions are necessary to ensure compliance with Part D or CMS requirements.

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Resources

1. Smart will retain consultants to assist with its remediation efforts. Services to be provided by the consultants include, but are not limited to: identifying operational issues and root causes, reviewing formulary edit changes and implementation plans, and implementing a rejected claims audit process. Smart will also supplement its current staff with consultants to help with day-to-day clinical operations.
2. Smart will increase its staff, to include additional call center staff, pharmacists, a Vice President of Clinical Operations, and a new Chief Executive Officer.

Formulary Benefit and Transition of Coverage Administration

3. Smart will remove all formulary edits except for Part B vs. D and safety edits. Smart reported removing these edits from its operating formularies on Monday, May 13, 2013. Smart will monitor to ensure all formularies are operating properly and without incident.
4. Smart recently experienced inappropriate claims rejections due to a National Drug Code (NDC) coding issue. Smart has confirmed that all missing NDCs (approximately 1200) have been loaded into its claims adjudication file and the issue was fixed on April 18, 2013. Smart has initiated and will continue outreach to affected enrollees to ensure they receive their drugs and are reimbursed for any inappropriate out-of-pocket expenses.
5. Smart will perform a daily rejected claims review and provide CMS with reports of trends, rejections, and corrections. Smart will perform a trend analysis based on changes to the formulary and examine reject codes to ensure claims are rejecting appropriately. Smart will obtain rejected claims and perform analysis every couple of hours. Smart will identify root causes, and ensure issue resolution.

Coverage Determinations, Appeals, and Grievances (CDAG)

6. Smart will provide CMS regular reporting on the resolution of coverage determinations, appeals, and grievances (CDAG). Smart has contacted affected pharmacies and enrollees, and has implemented a process to reimburse enrollees and make them whole.

First tier, Downstream and Related entity (FDR) Oversight

7. Smart will conduct an internal process improvement and gap analysis to ensure appropriate oversight of its first tier, downstream and related entities with the immediate focus on its Pharmacy Benefit Manager (PBM) and consultants. Smart is increasing oversight of its current PBM. This includes:
 - Reviewing the PBM's internal processes, conducting a gap analysis, and real-time monitoring of all PBM activities;

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- CDAG monitoring, with specific emphasis on improving timeliness, root cause analysis, processing of Complaint Tracking Module complaints, as well as any internal complaints, and enrollment processing;
- Identifying shortfalls and managing workflow;
- Reviewing enrollment and disenrollment, including policies and procedures, desktop instructions, and related processes; and
- Performing internal quality assurance reviews based on historical information.

Smart will create and submit to CMS, a timeline reflecting all work plan activities. This timeline will be a detailed outline of a plan of action to correct all noted deficiencies. It will include (at a minimum) milestones with actions planned, projected completion dates, accountable parties, and written narratives for each of the work plan activities. The completed document will guide communications with CMS, and serve as a tool for CMS to monitor Smart's progress.

CMS requests that Smart provide the work plan with any additional actions, as applicable, within seven calendar days, or by May 24, 2013. These materials should be submitted to Lisa Littleaxe at lisa.littleaxe@cms.hhs.gov.

Notwithstanding any contractor assistance, Smart is solely responsible for the identification, development, and implementation of the work plan, and for demonstrating to CMS that the underlying deficiencies have been corrected and are not likely to recur.

In the event your organization does not successfully resolve its violations of Part D requirements, we will consider additional compliance and enforcement actions including taking action to immediately terminate Smart's contract pursuant to 42 C.F.R. Part 423, Subparts K.

If you have any questions about this notice, please contact Lisa Littleaxe at lisa.littleaxe@cms.hhs.gov.

Sincerely,

/s/

Gerard J. Mulcahy
Director
Medicare Parts C & D Oversight and Enforcement Group

cc:

Patricia Axt, CMS
Lisa Littleaxe, CMS
Pam Conroy, CMS
Stephanie Bayer, Medicare Compliance Officer, Smart